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May 26, 2020

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia SC 29210

**Re: South Carolina Telephone Coalition Summary of Comments and Request for
Clarification of Requirement to Track Revenue Impacts and File Quarterly Reports
Docket No. 2020-106-A**

Dear Ms. Boyd:

Pursuant to Order No. 2020-40-H, the South Carolina Telephone Coalition member companies (“SCTC”) hereby submit the following brief summary of the comments filed on their behalf on May 22, 2020:

- As detailed in previous filings in this docket, the SCTC member companies have taken various approaches to assist their customers during the COVID-19 pandemic. SCTC member companies have worked with their local communities, and the responses may vary due to the different needs of their respective communities. We respectfully submit that there is no “one-size-fits-all” approach. What may work for electrical utilities may not work for telephone utilities, and what may work for large utilities may not be feasible for smaller utilities.
- The SCTC member companies sincerely appreciate the Commission’s and ORS’s efforts to identify and remove any regulatory obstacles that may restrict utilities in exercising the flexibility they need to work with customers as needed during this unprecedented time. SCTC member companies have implemented a number of temporary measures, and will continue to consider additional measures that may be appropriate for their local communities. However, we ask that no particular measure be mandated for all utilities. This is particularly true for telephone utilities, who are not rate regulated by the Commission and, therefore, do not have the same

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ability other utilities may have to recover the cost of these measures in future rate cases.

- We also respectfully request that the Commission clarify its requirement that utilities track and file quarterly reports regarding the revenue impacts, incremental costs and savings related to COVID-19, to the extent necessary to make clear that telephone utilities are not included in the requirement. This is consistent with the Commission's recent ruling in a similar matter, where the Commission found that it was not necessary for telephone utilities to track the impact of federal tax relief on the companies' operations, because telephone utilities are not regulated based on their costs and earnings.

Sincerely,

Burr & Forman LLP



Margaret M. Fox